

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 21cr10216
	)	
v.	)	Violation:
	)	
TAMARA KHATUNTSEVA,	)	<u>Count One:</u> Wire Fraud
	)	(18 U.S.C. § 1343)
Defendant	)	(18 U.S.C. § 2 – aiding & abetting)
	)	
	)	<u>Forfeiture Allegation:</u>
	)	(18 U.S.C. § 981(a)(1)(C) and
	)	28 U.S.C. § 2461)
	)	
	)	

INFORMATION

The United States Attorney charges that:

Between on or about December 1, 2017 through in or about August 2020, at  
Sudbury, Framingham, Newton, Boston, and elsewhere in the District of Massachusetts, the  
defendant,

TAMARA KHATUNTSEVA

having devised and intending to devise a scheme and artifice to defraud, and for obtaining money  
and property in the amount of not less than \$40,000 or more than \$150,000, by means of materially  
false and fraudulent pretenses, representations, and promises, did transmit and cause to be  
transmitted by means of wire communications in interstate and foreign commerce, writings, signs,  
signals, pictures, and sounds for the purpose of executing a scheme to defraud.

All in violation of Title 18, United State Code, Sections 1343 and 2.

FORFEITURE ALLEGATION  
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1343, set forth in Count One, the defendant,

TAMARA KHATUNTSEVA,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

NATHANIEL R. MENDELL  
Acting U.S. Attorney

BY: /s/ Laura J. Kaplan  
Laura J. Kaplan  
Assistant U.S. Attorney

July 20, 2021